

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

BOBBY TURNER,)	
)	
Plaintiff,)	Civil Action
)	File No. 4:16-cv-00106-HLM-WEJ
v.)	
)	
FINANCIAL BUSINESS AND)	
CONSUMER SOLUTIONS, INC. d/b/a)	
FBCS, f/k/a FEDERAL BOND)	
COLLECTION SERVICE, INC.,)	
)	
Defendant.)	
_____)	

**AFFIDAVIT OF PLAINTIFF'S COUNSEL, SAMANTHA L.
TZOBERI, IN SUPPORT OF PLAINTIFF'S REQUEST FOR
ENTRY OF CLERK'S DEFAULT**

FULTON COUNTY)
)
STATE OF GEORGIA)

Personally appeared before the undersigned officer duly authorized to administer oaths, Samantha L. Tzoberi, who, after being duly sworn, deposes and states as follows:

1. My name is Samantha L. Tzoberi. I am over twenty-one years of age and am competent in all respects to make this Affidavit. I make this Affidavit based on my personal knowledge that the facts stated herein are true and correct.

2. I am an attorney for the Plaintiff Bobby Turner (“Plaintiff”) in the above-styled proceeding.

3. I am a licensed member of the State Bar of Georgia, and I currently practice in the Atlanta law firm of Berry & Associates.

4. Plaintiff filed the Complaint in this action on April 20, 2016.

5. Defendant Financial Business and Consumer Solutions, Inc., d/b/a FBCS, f/k/a Federal Bond Collection Service, Inc. (“Defendant”) waived service on June 14, 2016 and agreed to file and serve an answer, or motion under Rule 12, within 60 days from April 25, 2016. [Docket No. 7].

6. Defendant’s deadline to plead, defend, or otherwise respond to the Complaint served on it was June 24, 2016.

7. As shown by this Court’s docket, Defendant has failed to plead, defend, or otherwise respond to the Complaint served upon it within the time prescribed by the Federal Rules of Civil Procedure.

[Signature appears on next page.]

FURTHER AFFIANT SAYETH NAUGHT!

Samantha L. Tzoberi
Samantha L. Tzoberi

Sworn and subscribed before me
this *8th* day of July, 2016.

Stella J. Prater
Notary Public

My Commission expires: *Sept. 9, 2019*

